



**Evergreen Islands
Board of Trustees**

Tom Glade
President

Brian Wetcher
Vice President

Brenda Lavender
Secretary

Kathryn Alexandra
Treasurer

Mark Backlund

Joseph Barnes

Rich Bergner

Steve Clark

Andrea Doll

Arlene French

Julie White

mailing address
P.O. Box 223
Anacortes WA 98221

web address
evergreenislands.org

tax deductions
Evergreen Islands is a
501(c)(3) organization.
Your contributions are
tax-deductible.

EVERGREEN ISLANDS

November 09, 2012

To: GPT/BNSF Custer Spur EIS Co-Lead Agencies
c/o CH2M HILL; 1100 112th Avenue NE, Suite 400; Bellevue, WA 98004

Re: Gateway Pacific Terminal at Cherry Point Proposals

On the behalf of Evergreen Islands, I am submitting the following comments regarding the proposals for the Gateway Pacific Terminal at Cherry Point and the Custer Spur Projects. For nearly forty years, Evergreen Islands, an environmental organization, has worked to protect the environments of Skagit County's marine islands.

Evergreen Islands urges the federal, state and local agencies initiate a full-blown comprehensive and programmatic environmental impact statement to address the massive onslaught of natural resource extraction currently underway in the Northwest corner of the United States. These natural resources include coal, oil, and fresh water.

We join with our Washington State Representatives Reuven Carlyle (D-Seattle), Kristine Lytton (D-Anacortes), Joe Fitzgibbon (D-Seattle), and Jeff Morris (D-Mount Vernon) in asserting that **the federal review is too narrowly focused**. We strongly agree with our state representatives that a multi-agency task force is required to study *not only* the **economic, environmental, transportation, and infrastructure impacts** of building the country's largest coal export terminal outside of Bellingham, *but also* to study these same impacts of building of the country's largest bottling plant in Anacortes.

Demonstrating the Need for a Programmatic EIS

The **Affected Environment** is a broad geographic area, which is regional in scope; crossing political boundaries and covering numerous ecosystems.

- Bakken Oil unit trains from Epping, North Dakota to Anacortes, Washington – 1,200 miles through Montana, Idaho, and Washington states.
- Coal unit trains from Douglas, Wyoming to Ferndale, Washington – 1,600 miles through Wyoming, Montana, Idaho, and Washington states
- Water unit trains from Anacortes, Washington to points yet to be determined (5 MGD see Attachment 1).

The **Range of Alternatives**, including future land use scenarios, with differing objectives must consider the following issues:

- Unit Trains: Coal Trains, Oil Trains, Water Trains
- Oil Refineries: BP at Cherry Point, Shell and Tesoro at March Point
- Water Bottling Plant: Tethys Enterprises at Turners Bay
- Coal Terminals: Bellingham (Gateway Pacific at Cherry Point), Grays Harbor, Port Westward, Longview, Boardman, Coos Bay

There are multiple **Environmental Consequences** due to the cumulative effects of these multiple future activities.

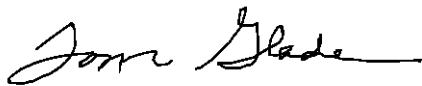
The **Cumulative Effects** include “the probable significant adverse environmental impacts¹” of:

- coal trains (9 to date),
- oil trains (1 to date, 2 proposed),
- water trains (4 proposed to date)
- oil tankers (unknown)
- Panamax and Capesize coal ships (unknown).

The total number of unit trains being proposed represents 30 train trips (9 x 2 Coal Trains + 4 x 2 Water Trains + 2 x 2 Oil Trains) through Burlington, Washington.

The **Mitigation Measures** should develop broad environmental policies, generic programs, or generic plans that would apply to these future projects, the details and location of which are not yet fully known.

Respectfully yours,



Tom Glade, President
Evergreen Islands

¹ WAC 197-11-330, Threshold determination process.
<http://apps.leg.wa.gov/wac/default.aspx?cite=197-11-330>

ATTACHMENT 1

TETHYS ENTERPRISES BOTTLING PLANT IN ANACORTES, WA

City of Anacortes and Tethys Enterprises [Water Service Agreement](#)², October 1, 2010

- five (5) million Gallons Per Day of water (nearly 2 billion gallons per year)

City of Anacortes [UGA Expansion Application](#)³, July 31, 2012

- Convert 11.15 acres of Skagit Rural Reserve Land (RRv) to Anacortes Urban Growth Area (A-UD) to provide a building site for the Tethys Bottling Plant.

100+ Car Water Trains

An April 26, 2010 e-mail from Don Wick (Executive Director of Economic Development Association of Skagit County and Ryan Larsen (Anacortes Director of Planning and Community Development) to Matthew Kelly, Tethys Inc., established the following:

The second issue is that of increased rail traffic. We'd be generating significant increases in rail traffic which need to be discussed now before getting any deeper into this. Think 400 rail cars a day - 4 unit trains - and how that may effect access to the Skagit Airport and other businesses on that side of SR 20.

² URL: <http://www.cityofanacortes.org/Legal/LegalDocs/file.asp?ID=15>

³ URL: <http://www.cityofanacortes.org/Council/Packets/file.asp?ID=977>